

II. Contested Matters Going Forward

2. ***Contract Rejection Motion***: Debtors' First Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts and Unexpired Leases, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 16, filed 2/2/17]

Objection Deadline: February 23, 2017, at 4:00 p.m. (CT)

Responses Received:

- A. Objection of Encana Oil & Gas (USA) Inc. to Debtors' First Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts and Unexpired Leases, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 209, filed 2/23/17]
- B. Supplemental Objection of Encana Oil & Gas (USA) Inc. Concerning Debtors' First Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts and Unexpired Leases, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 486, filed 3/30/2017]
- C. The Debtors received informal comments from various parties in interest.

Related Documents:

- A. Debtors' Reply to Objection of Encana Oil & Gas (USA) Inc. to Debtors' First Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts and Unexpired Leases, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 337, filed 3/9/17]
- B. Notice of Hearing on Debtors' First Omnibus Contract Rejection Motion as It Relates to Rejection of Encana Agreement [Docket No. 338, filed 3/9/17]
- C. Joint Witness and Exhibit List for April 5, 2017 Hearing on Debtors' Motion to Reject Encana Agreement [Docket No. 497, filed 4/3/17]
- D. Debtors' Response to Supplemental Objection of Encana Oil & Gas (USA) Inc. Concerning Debtors' First Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts and Unexpired Leases, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 500, filed 4/3/17]
- E. Statement of Ad Hoc Committee of Senior Noteholders in Support of Debtors' First Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts and Unexpired Leases [Docket No. 504, filed 4/3/17]**
- F. Statement of the Official Committee of Unsecured Creditors of Vanguard Natural Resources, LLC, et al. in Support of Debtors' First Omnibus Motion for Entry of an Order Authorizing Rejection of Certain Executory Contracts**

and Unexpired Leases, Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 506, filed 4/3/17]

G. Witness and Exhibit List of Official Committee of Unsecured Creditors of Vanguard Natural Resources, LLC for April 5, 2017 Hearing [Docket No. 507, filed 4/4/17]

H. Notice of Filing of Supplemental Proposed Order for Contract Rejection Motion Set for Hearing on April 5, 2017 [Docket No. 509, filed 4/4/17]

Status: This matter is going forward.³

3. ***Bidding Procedures Motion:*** Debtors' Motion for Entry of: (I) Order (A) Approving Bidding Procedures for Sale of Certain Oil and Gas Assets, (B) Approving Form and Manner of Notices Thereof, (C) Approving Bid Protections for Stalking Horse Purchaser, (D) Scheduling Dates to Conduct Auction and Hearing to Consider Final Approval of Sale, Including Treatment of Executory Contracts and Unexpired Leases, and (E) Granting Related Relief; and (II) Order (A) Approving Sale of Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 429, filed 3/20/17]

Objection Deadline: March 31, 2017, at 4:00 p.m. (CT)

Responses Received:

- A. Limited Objection of Encana Oil & Gas (USA) Inc. to Debtors' Motion for Entry of: (I) Order (A) Approving Bidding Procedures for Sale of Certain Oil and Gas Assets, (B) Approving Form and Manner of Notices Thereof, (C) Approving Bid Protections for Stalking Horse Purchaser, (D) Scheduling Dates to Conduct Auction and Hearing to Consider Final Approval of Sale, Including Treatment of Executory Contracts and Unexpired Leases, and (E) Granting Related Relief, Etc. [Docket No. 488, filed 3/31/17]
- B. Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of: (I) Order (A) Approving Bidding Procedures for Sale of Certain Oil and Gas Assets, (B) Approving Form and Manner of Notices Thereof, (C) Approving Bid Protections for Stalking Horse Purchaser, (D) Scheduling Dates to Conduct Auction and Hearing to Consider Final Approval of Sale, Including Treatment of Executory Contracts and Unexpired Leases, and (E) Granting Related Relief; and (II) Order (A) Approving Sale of Assets Free and Clear of all Liens, Claims, Interests, and Encumbrances, (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 489, filed 3/31/2017]

³ This motion is going forward as to the Encana agreement only. Relief as to other counterparties was granted pursuant to the Court's order of March 1, 2017 [Docket No. 277].

C. The Debtors received informal comments from various parties in interest.

Related Documents:

- A. Debtors' Witness and Exhibit List for April 5, 2017 Hearing (Other Than Debtors' Motion to Reject Encana Agreement) [Docket No. 498, filed 4/3/17]
- B. Debtors' Omnibus Reply in Further Support of Their Motion for Entry of: (I) Order (A) Approving Bidding Procedures for Sale of Certain Oil and Gas Assets, (B) Approving Form and Manner of Notices Thereof, (C) Approving Bid Protections for Stalking Horse Purchaser, (D) Scheduling Dates to Conduct Auction and Hearing to Consider Final Approval of Sale, Including Treatment of Executory Contracts and Unexpired Leases, and (E) Granting Related Relief; and (II) Order (A) Approving Sale of Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 502, filed 4/3/17]
- C. Notice of Filing of an Amended Proposed Order for Bid Procedures Motion Set for Hearing on April 5, 2017 [Docket No. 503, filed 4/3/17]
- D. Witness and Exhibit List of Official Committee of Unsecured Creditors of Vanguard Natural Resources, LLC for April 5, 2017 Hearing [Docket No. 507, filed 4/4/17]**

Status: This matter is going forward.

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Dated: April 4, 2017

Respectfully Submitted,

/s/ James T. Grogan

Chris L. Dickerson, Esq. (admitted *pro hac vice*)

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Counsel to Vanguard

CERTIFICATE OF SERVICE

I certify that on April 4, 2017, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas. Additionally, I have caused Prime Clerk, LLC, the Debtors' Claims and Noticing Agent, to serve the foregoing document on the master service list.

/s/ James T. Grogan

James T. Grogan